

1 Likewise, during cross-examination Mr. Cohen read an
2 excerpt from Mr. Juggert's deposition at page 59, line 15.
3 And again he neglected to point out that he conducted an
4 additional examination on his own volition about that exact
5 testimony which did affect and clarify the earlier testimony.
6 And that additional examination is set forth at pages 8 to 10
7 of TBF Exhibit 125. And we believe the record should fairly
8 include those portions. Because they're so lengthy, we did it
9 as an exhibit to make sure they're here in the record
10 accurately. And with that, I have no questions of the
11 witness. But I wish to move TBF Exhibit 125.

12 MR. COHEN: Your Honor, I don't agree with Mr.
13 Topel's characterization. But I think he has the, the
14 opportunity, the right to offer deposition testimony on
15 redirect. And so on that basis, I don't object to the, to the
16 offering of the, of the testimony.

17 JUDGE CHACHKIN: All right.

18 MR. COHEN: But I certainly don't agree with his
19 characterization.

20 JUDGE CHACHKIN: I understand the purpose of this is
21 to counter a claim of impeachment to show his testimony was
22 consistent at the deposition concerning whatever the subject
23 matter was.

24 MR. TOPEL: Yes, and what it actually was at the
25 deposition.

1 JUDGE CHACHKIN: Yes. For that limited purpose, TBF
2 Exhibit 125 is received.

3 (Whereupon, the document referred to
4 as Trinity Broadcasting Exhibit No.
5 125 was received into evidence.)

6 MR. TOPEL: Thank you, Your Honor. Mr. Juggert, if
7 you would turn, please, to Mass Media Bureau Exhibit 125 which
8 appears in volume 3. I'm going to have one question for you
9 concerning this exhibit. Before I do that, Your Honor --

10 JUDGE CHACHKIN: Yes.

11 MR. TOPEL: -- I would like to request a
12 stipulation. And I'll state the stipulation and then show the
13 parties in the room the, the backup for it. I would request a
14 stipulation that on May 15th, 1992 -- well, first of all, let
15 me direct -- I'm referring right now to page 1 of Mass Media
16 Bureau Exhibit 125 which is reaction by written consent
17 unsigned by David Espinoza. And I'd like to request a
18 stipulation that on May 15th, 1992 in response to a letter
19 from the FCC that is currently in this record as Glendale
20 Exhibit 219, NMTV filed with the Commission a copy of the
21 unsigned action that is page 1 of Bureau Exhibit 125. And I
22 have that filing here.

23 MR. COHEN: I'll accept Mr., Mr. Topel's
24 representation. He certainly is a man I trust. If he tells
25 me that, I'm going to accept that. He doesn't have to prove

1 that to me if he tells it to me.

2 MR. SHOOK: The Bureau will so stipulate.

3 MR. McCURDY: No objection.

4 JUDGE CHACHKIN: Stipulation is accepted.

5 MR. TOPEL: Thank you. Mr. Juggert, turning to page
6 2 of Mass Media Bureau Exhibit 125, can you tell me why you
7 got that document signed by -- Espinoza?

8 MR. JUGGERT: Because when I saw that it had not
9 been -- the, the original had not been signed by Mr. Espinoza,
10 I was concerned that whatever had the action taken at that
11 meeting was not legal until Mr. Espinoza signed it. And so I
12 asked Jane Duff to send this document to Mr. Espinoza for his
13 signature to solidify the fact that all of this meeting was
14 approved by all board members as allowed by the bylaws of
15 Translator or, or National Minority TV.

16 MR. TOPEL: I have no further questions, Your Honor.

17 MR. COHEN: I have no questions.

18 JUDGE CHACHKIN: Does the Bureau have any questions
19 based on redirect?

20 MR. SHOOK: No, Your Honor.

21 JUDGE CHACHKIN: You're excused. Thank you.

22 MR. JUGGERT: Oh, thank you. Get off easy today.

23 MR. SCHONMAN: There's a flight leaving at 10:30.

24 MR. JUGGERT: Thank you.

25 (Whereupon, the witness was excused.)

1 MR. MULLIN: Can we go off the record, Your Honor?

2 JUDGE CHACHKIN: All right --

3 (Off the record at 10:08 a.m. Back on the record at
4 10:14 a.m.)

5 JUDGE CHACHKIN: All right. Let's go on the record.
6 Is Mr. Ramirez present?

7 MR. TOPEL: Yes, Your Honor. I call to the witness
8 stand Dr. Armondo Ramirez.
9 Whereupon,

10 DR. ARMONDO RAMIREZ
11 having been first duly sworn, was called as a witness herein
12 and was examined and testified as follows:

13 DIRECT EXAMINATION

14 BY MR. TOPEL:

15 Q Yes. Sir, would you state your full name for the
16 record please?

17 A My name is Armondo Ramirez.

18 Q And what is your resident address?

19 A 14520 Close Street, Whittier, California 90604.

20 Q Thank you. Dr. Ramirez, I'm showing you a document
21 that has been received into evidence in this proceeding as
22 Trinity Broadcasting of Florida Exhibit 103. There is the
23 title Testimony of Armondo Ramirez. And directing your
24 attention to the supporting declaration that appears at the
25 end of page 12. And my question to you, sir, is that your

1 signature on that declaration?

2 A Yes, that is.

3 Q And does this document constitute your direct
4 testimony to the Federal Communications Commission in this
5 proceeding?

6 A Yes, it does.

7 Q Okay. Your Honor, I believe the witness is
8 available for examination.

9 JUDGE CHACHKIN: Mr. Cohen.

10 MR. COHEN: Yes, sir.

11 CROSS-EXAMINATION

12 BY MR. COHEN:

13 Q Good morning, doctor.

14 A Good morning.

15 Q You will recall at, at your deposition I reviewed
16 with you the sequestration rule that the judge had imposed in
17 this proceeding.

18 A Yes, sir.

19 Q And I asked you the same question, you have I take
20 it no knowledge of any of the questions put to any of the
21 witnesses that have come before you at this hearing in
22 Washington, am I correct?

23 A That is correct, sir.

24 Q And you have no knowledge of any of the answers.

25 A That is correct, sir.

1 Q So you have no knowledge of the testimony that any
2 of them have given. Is that correct?

3 A That is correct.

4 Q Thank you. Now I'm correct, am I not, sir, that you
5 have reviewed your deposition?

6 A Yes, I have.

7 Q Have you reviewed any other depositions?

8 A No, sir.

9 Q I'd like to ask you to look at paragraph 4 of your
10 testimony that Mr. Topel had put before you which is on page
11 5. Would you tell me when you're done?

12 A Yes, I have.

13 Q Do you see that it states therein that you assisted
14 a man named Bonela (phonetic sp.) in directing the Spanish
15 Praise the Lord program?

16 A Yes, sir.

17 Q My question is do you receive any compensation
18 whatsoever for your efforts?

19 A No, sir. They were volunteer efforts.

20 Q And the same question, paragraph 5 where there's a
21 reference to the, the Spanish language public affairs program
22 called "Reporte Publico."

23 A Um-hum.

24 Q Did you receive any compensation at all for that?

25 A Yes, for phone calls, gas money basically. Very

1 minimum.

2 Q Give me an example of what you mean by minimum.

3 A Oh, probably -- I forget. Probably \$100, \$200 a
4 month.

5 Q Now you state there that you, you volunteered to
6 assist and also host. So I want to ask you if you, if you can
7 recall, be specific, what compensation did you receive to
8 assist, and what compensation did you receive to host?

9 A Well, there are two different programs there. One
10 of them is --

11 Q Thank you for pointing that out.

12 A -- the Praise the Lord was strictly, totally
13 volunteer.

14 Q That's -- you received nothing for that.

15 A Nothing.

16 Q Go ahead.

17 A Then "Reporte Publico" was basic expenses.

18 Q And that was about \$100 a month?

19 A 200, something like that. I really can't recall at
20 this point.

21 Q A range of 100 to 200 a month is sounds --

22 A Somewhere around there.

23 Q Did you receive an honorarium?

24 A Yeah, that's what I mean that it was part of that.
25 But it was minimal. The exposure, that's my -- that was

1 | mainly my reward to be exposed to the community. That was --
2 | I even felt like paying them for that. That advanced my
3 | career.

4 | Q You've answered the question. Thank you.

5 | A Yeah.

6 | Q Now there's a reference to the program "Felicidad"
7 | in paragraph 6.

8 | A Yes.

9 | Q Is "Felicidad" carried on any TBN, any station
10 | that's owned by, by TBN?

11 | A No, sir.

12 | Q Is it carried on any station that's affiliated with
13 | TBN?

14 | A No, sir.

15 | Q Is it carried on -- are you familiar with the entity
16 | Community Educational Television?

17 | A Yes.

18 | Q Is it carried on that station?

19 | A No, sir.

20 | Q Are you familiar with the entity Jacksonville
21 | Educational Broadcasting?

22 | A No, I'm not.

23 | Q You're not.

24 | A Familiar with that.

25 | Q Now in paragraph 6 in the middle of the paragraph,

1 | there's a reference to the fact that you've been hosting a
2 | program on TBN's channel 40 called our, Our Town. You see
3 | that?

4 | A Yes, sir.

5 | Q Do you receive any compensation for hosting Our
6 | Town?

7 | A Yes.

8 | Q And how much do you receive?

9 | A \$250 average a month. We -- that's what we tape.
10 | We tape about four programs a month.

11 | Q Now going on I, I see that you've, you have
12 | reference to a program called "Se Habla Ingles?"

13 | A Yes.

14 | Q Well, let me ask you --

15 | A It was a 12-week series.

16 | Q Well, let me ask you the question. I haven't asked
17 | you a question.

18 | A I'm sorry.

19 | Q Is that station -- excuse me, is that program
20 | carried on any station that's, that's part of the TBN network?

21 | A Yes, I believe so. In, in Houston.

22 | Q And there's a, there's a station in Houston that's
23 | licensed to Community Educational Television. Is that
24 | correct?

25 | A Yes.

1 Q And that's -- and the program is carried on that
2 station.

3 A Yes, sir.

4 Q Who made the arrangements for, for the program to be
5 carried on the Houston station?

6 A My conversations were with Mrs. Jane Duff.

7 Q So she made those arrangements.

8 A Yes.

9 Q Is, is the program carried on any other stations
10 other than the Houston station and Channel 40?

11 A It's not aired on Channel 40. "Se Habla Ingles" is
12 not aired on Channel 40.

13 Q I stand corrected. You're part right. I'm, I'm in
14 error. Is it -- thank you. Is it aired on any station other
15 than the Community Educational station in --

16 A Not to my knowledge.

17 Q Thank you. Now I want to ask you some questions
18 about NMTV. Regarding this concerns the purposes of, of NMTV.
19 Did you ever receive a copy of the articles of incorporation
20 of the, of NMTV?

21 A Yes, I did.

22 Q And when did you receive a copy of the articles of
23 incorporation, sir?

24 A After I was voted in as a director, I requested to
25 review all the written material from the beginning of the

1 organization. And upon my reviewing all the documents, I
2 requested a copy of the articles of incorporation and the
3 bylaws.

4 Q I see. Now you were elected an officer on April --
5 a director on April 20, 1993. That's -- you can accept that
6 as a fact.

7 A Yes.

8 Q That's, you know, that's what the record reflects.
9 So, so you -- that's when you received the articles of -- you
10 didn't receive the, the articles and the bylaws until after
11 April 20, 1993, that's --

12 A Yeah, the written documents, yes.

13 Q And did you read the articles?

14 A Yes.

15 Q And you read them after you were elected a director.

16 A Yes.

17 Q And give me your best estimate as to how much time
18 you devoted to reading the articles.

19 A That was one of the documents that I read
20 thoroughly. I mean I cannot hold it --

21 Q You read, you read it thoroughly.

22 A Yes.

23 Q Okay.

24 A Yes.

25 Q And did you read the, the bylaws thoroughly?

1 A Yes. I mean I went page by page.

2 Q Were there any other documents that you received --
3 and you received these from Mrs. Duff. Is that correct?

4 A Yes.

5 Q Were there any other documents besides the bylaws
6 and the articles that you received from Mrs. Duff that you
7 read thoroughly?

8 A She made available any of the documents. But I just
9 requested those so I could keep them in my files.

10 Q Those were the only documents that you requested
11 personal copies of. Is that it?

12 A Yes.

13 Q Now when you said she made available to you, explain
14 what you mean by making available.

15 A She took me to a special room where all the files
16 were contained. And she brought everything out, and she said
17 you're welcome to see anything that you want. If you have any
18 questions, ask me.

19 Q And, and just so the, the record is clear, did she,
20 did she point you to a file cabinet, or did she point you to a
21 table where documents were on the table?

22 A Both.

23 Q Both. And she said you're free to inquire. Is that
24 it?

25 A Yes.

1 Q And you did.

2 A I did.

3 Q And you stayed in that room and reviewed the

4 documents?

5 A Yes.

6 Q And how, how long did you spend?

7 A At least 3 hours.

8 Q And as a consequence of that you, you only asked for

9 personal copies of the bylaws and the articles.

10 A Yes.

11 Q Is that an accurate --

12 A Knowing that if I wanted to see anything else, I

13 knew where the records were and in what file cabinet.

14 Q Now did you have any questions for Mrs. Duff

15 concerning the articles?

16 A Basically not. Because I was in agreement.

17 Q Did you have any questions of Mrs. Duff concerning

18 the bylaws?

19 A No.

20 Q Did you discuss the articles with Mrs. Duff, or was

21 that not necessary?

22 A It was not necessary at that point.

23 Q And I -- did you discuss the bylaws with Mrs. Duff,

24 or was that not necessary?

25 A At this point, no. It was satisfactory.

1 Q Did there ever come a time when, when you discussed
2 the articles with Mrs. Duff?

3 A No.

4 Q Did there ever come a time when you discussed the
5 bylaws with Mrs. Duff?

6 A No, I did not see it necessary.

7 Q Because you read the documents and you understood
8 them.

9 A And I agreed with them.

10 Q And you agreed with them. Am I correct that you
11 never have had occasion back in 1993 to discuss the articles
12 with anybody other than Mrs. Duff?

13 A Right.

14 Q And am I correct that in 1993 you never had occasion
15 to discuss the bylaws with anybody other than Mrs. Duff?

16 A Right.

17 Q Now I'd like to ask you to look at the bylaws --
18 look at the articles rather. And those articles --

19 MR. COHEN: Would you put those before the witness?
20 Thank you.

21 MR. TOPEL: Okay. Tell me where they are.

22 MR. COHEN: Do you want to know the exhibit number?

23 MR. TOPEL: Sure.

24 MR. COHEN: Okay. Thought you'd never ask. The
25 articles are Bureau Exhibit 7.

1 MR. TOPEL: Your Honor, if I could approach the
2 witness I'll instruct him on the --

3 JUDGE CHACHKIN: Why don't you do that?

4 MR. TOPEL: -- on the system and then I'll --

5 JUDGE CHACHKIN: All right. We'll go off the
6 record.

7 MR. COHEN: Thank you. That's a very good point. I
8 would appreciate --

9 (Off the record at 10:29 a.m. Back on the record at
10 10:30 a.m.)

11 MR. COHEN: Thank you, Your Honor.

12 BY MR. COHEN:

13 Q I wanted -- I want you to direct your attention to
14 Bureau Exhibit 7 which are the articles of incorporation of
15 Translator TV, Inc. They're admitted in evidence. Just spend
16 a minute or two reviewing those. I know you've read them
17 before, but just re-familiarize yourself. And tell me when
18 you've done it.

19 (Pause.)

20 Q You've read it.

21 A Yes.

22 Q Dr. Ramirez, my question is you have the articles
23 before you. Do they say anything concerning the purpose of
24 the corporation is to help minorities get involved in the
25 powerful media of communication?

1 A No, it doesn't state that.

2 Q And do you know of any document which states that?
3 That meaning the purpose of the company was to help minorities
4 get involved in the powerful media of communication.

5 A I cannot recollect that right now. Maybe in the
6 bylaws or --

7 Q Well --

8 A I really can't recall.

9 Q I want, I want you to satisfy yourself. And I'd
10 like you to look at the bylaws. And the bylaws are the next
11 exhibit, Exhibit 9. And spend as much time as you need to
12 satisfy yourself on that point. It's the -- it's not the next
13 exhibit. It's the second next exhibit, 9.

14 A Right.

15 Q Do you have them before you?

16 A Bylaws of Translator --

17 Q Yes. Spend as much time as you need.

18 (Pause.)

19 Q Have you had a chance to review the bylaws?

20 A Yes.

21 Q And do you see anything in there which states that
22 the purpose of the company was to help minorities get involved
23 in the powerful media of communication?

24 A You're quoting from my deposition.

25 Q I'm quoting from your testimony, sir. Paragraph --

1 A My testimony.

2 Q -- 7 which I welcome you to look at. It's in front
3 of you.

4 A Yes. My only point is that that is based on my
5 conversation with Mrs. Jane Duff when we talked about the
6 possibility of me being involved.

7 Q Oh, I understand that very well.

8 A Yes.

9 Q You state that.

10 A Yes.

11 Q In your testimony you say she explained that the
12 purpose of the company. And I'm well aware of the accuracy of
13 what you've just said, yes. But I take it that there's
14 nothing in the bylaws along the lines of what Mrs. Duff told
15 you.

16 A Well, not in these here. You're right.

17 Q Now is this the very first time, doctor, that you
18 have come to the realization that neither the articles or the
19 bylaws or any other piece of paper reflect what Mrs. Duff told
20 you was the purposes of the corporation?

21 A Well, probably the paper. But the reality of what
22 we're doing in Portland --

23 Q Well, that's not my question. I'm not asking you
24 about the reality of what you're doing in Portland. Listen to
25 the question.

1 A I did, I did understand your question, sir.

2 Q Well, please answer the question. The question is
3 is this the first time that you are aware that there are no
4 documents to your knowledge which state what Mrs. Duff told
5 you was the purpose of the corporation?

6 A Well, not in these two documents that I just
7 reviewed again. There may be others. I do not know.

8 JUDGE CHACHKIN: Well, do you know of any other
9 document that says --

10 DR. RAMIREZ: I cannot --

11 JUDGE CHACHKIN: You personally.

12 DR. RAMIREZ: No, I cannot recollect.

13 BY MR. COHEN:

14 Q And I ask you again, is this the first time that you
15 became aware that there are no documents to your knowledge
16 which reflect what Mrs. Duff told you was the purpose of the
17 corporation?

18 A I want to make sure that I understand your question.

19 Q I want you to. If any -- anytime my questions are
20 not clear, tell me, and I'll try and make them clear for you.
21 I'm not trying to trick you, sir. I'm just trying to get your
22 understanding. You want me to ask you the question again?

23 A Yes, sir. This is the first time --

24 Q The question I'm trying to find out is I've asked
25 you to review the bylaws and the articles which you've done.

1 And you've agreed with me that there's nothing in either
2 document which reflects that the purpose of the corporation is
3 to help minorities get involved in the powerful media of
4 communication. And you've also said that there's no other
5 document you're aware of.

6 A Right.

7 Q That states -- and all I'm trying to find out, is
8 this the very first time you've focused on the fact that there
9 are no documents which --

10 A To my knowledge, yes.

11 Q Okay. Now I want you to -- I want to ask you a
12 couple of questions about the bylaws. First of all, do you
13 know without looking at the bylaws the authorized number of
14 directors?

15 A That exists now?

16 Q No, the authorized number. That is how many --

17 A Oh --

18 Q -- directors the corporation under its bylaws is
19 permitted to have. Do you know that of your own knowledge?

20 A No, I would have to --

21 Q Would you look at section 2 and read it to yourself
22 of the bylaws.

23 (Pause.)

24 Q It's on, it's on page -- well, they are not
25 numbered. So I can't help you. But I'll help you find it if

1 | you need some help.

2 | A Yes, the bylaws --

3 | Q Can I help you --

4 | A -- section 2?

5 | Q Yeah. Do you have that in front of you?

6 | JUDGE CHACHKIN: The witness has section 2.

7 | MR. COHEN: You have that in front of you?

8 | DR. RAMIREZ: Yes. Says members.

9 | MR. COHEN: Let me help you.

10 | MR. TOPEL: Okay. Just tell him what, what page of

11 | the exhibit.

12 | MR. COHEN: I'm -- the pages -- the exhibit is not

13 | numbered unfortunately.

14 | MR. TOPEL: Oh. Oh, I see.

15 | MR. COHEN: Section 2. Number and qualification of

16 | directors.

17 | DR. RAMIREZ: Okay.

18 | MR. COHEN: Read that to yourself. Tell me when

19 | you're ready.

20 | (Pause. Asides.)

21 | BY MR. COHEN:

22 | Q Tell me when you've read that.

23 | (Pause.)

24 | A I have, sir.

25 | Q Okay. So you see now that NMTV is authorized to

1 have no more than 10 directors.

2 A Correct.

3 Q Because members and directors are the same. Where,
4 where it says no more than 10 -- well, let's strike that.
5 They're -- NMTV is authorized to have 10 directors. You
6 understand that now?

7 A Yes.

8 Q Okay. Now since you have joined the board in April
9 of 1993, has the board given any consideration to increasing
10 the number of directors?

11 A No, sir, that has not been a subject of the two
12 board meetings that I have attended.

13 Q And have you given any consideration to that matter?

14 A No, sir. But it's a great idea.

15 Q Well, I think it is too. And that's why I want to
16 explore that with you. Wouldn't that be a wonderful way to
17 increase the participation of minorities?

18 A Yes, sir.

19 Q But that never occurred to you before.

20 A Not in the two meetings that I've been in.

21 Q Well, it never occurred to you when you reviewed the
22 bylaws carefully?

23 A No, sir. I'm sure there are many other things that
24 do not occur to me that may be beneficial.

25 Q So I take it then this is the very first time you've

1 given any consideration to that matter. That is the matter of
2 increasing the, the number of directors.

3 A Yes, and I thank you for pointing it out

4 Q And no one else has pointed it out to you or
5 discussed it with you who are on the board of NMTV, correct?

6 A No, sir.

7 Q Now am I correct that none of the board members come
8 from the Portland area?

9 A I, I believe that is correct.

10 Q And NMTV of course owns a station in Portland.

11 A Yes.

12 Q Has the board given any consideration to electing a
13 minority person who resides in the Portland area to become a
14 director?

15 A Not at the two board meetings that I've been at.

16 Q Have you given any consideration to that?

17 A No, not until now.

18 Q Do you think that's a good idea too?

19 A Certainly.

20 Q And that's a matter which has never been discussed
21 with you by any member of the NMTV board at all, correct?

22 A Correct.

23 Q And that's also a matter that you never gave any
24 consideration until I brought it to your attention a minute
25 ago, correct?

1 A That's right.

2 Q Do you know of your own personal knowledge the term
3 of office of the directors?

4 A I would have to review it again.

5 Q Okay. Do you know of your, of your personal
6 knowledge what the term of office of, of the officers are?

7 A No, I cannot answer that accurately.

8 Q Are you familiar with the word affiliate? And I'm
9 using that word now in a sense that NMTV is an affiliate of
10 TBN. Is that a term that you've heard before?

11 A Yes, sir.

12 Q And do you have a recollection of when you've heard
13 that term affiliate as I've used it for the first time?

14 A Yes. It's written here in the document.

15 Q Now do you have an understanding of what the word
16 affiliate means insofar as NMTV and TBN is concerned?

17 A Yes, sir. I have a --

18 Q Would you --

19 A -- general idea.

20 Q Would you tell me what your understanding is?

21 A It's an agreement between both entities to carry out
22 the same or programs and both however you say it facilities or
23 TV stations owned by each organization. And one provides --
24 or it can be a mutual thing which it is right now. There is,
25 there is programming provided by TBN aired on NMTV on their

1 main station. And also our Portland station produces
2 programming that airs on TBN.

3 Q Now are you aware whether TBN has an affiliate
4 relationship with, with any other television stations other
5 than the station that's owned by NMTV?

6 A Yes. There are many affiliates.

7 Q Is there a difference in the affiliation between
8 NMTV and TBN and the affiliation between other stations who
9 are affiliates of TBN? Is there a difference in the
10 affiliation --

11 A I really do not know whether there are different
12 categories or models. There may be, but I'm not aware of
13 that.

14 Q Do you know anything about the affiliate
15 relationship between TBN and Jacksonville Educational?

16 A No.

17 Q Or the affiliate relationship between TBN and
18 Community Education?

19 A No, sir.

20 Q Do you know if Jane Duff receives any compensation
21 from NMTV at all?

22 A I believe she doesn't.

23 Q Do you know?

24 A I really don't know for a fact.

25 Q Do you know for a fact if Paul Crouch receives any

1 compensation from NMTV?

2 A Not to my knowledge --

3 Q Well, what --

4 A -- at this point.

5 Q What is your knowledge based upon?

6 A On the reviewing of the documents.

7 Q Do you know what Jane Duff's responsibilities are at

8 TBN?

9 A She is the assistant to the president.

10 Q Do you know what her responsibilities entail?

11 A Administrative delegated by the president. But

12 specifically, I cannot give you a job description.

13 Q Do you know what percentage of her time she devotes

14 to TBN?

15 A No, I don't.

16 Q Do you know what percentage of her time she devotes

17 to NMTV?

18 A No, I don't.

19 Q Do you know whether she devotes time to any other

20 affiliates of TBN?

21 A I have no knowledge of that.

22 Q Do you know if she's a salaried employee of TBN?

23 A I believe she is.

24 Q How do you know that?

25 A Because she works there.